

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

Civ. Action No. 19 Civ. 08655

**JOINT STIPULATION AND
[PROPOSED] ORDER**

WHEREAS, Plaintiff has brought claims under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§2000e *et seq.*, the Equal Pay Act of 1963, 29 U.S.C. § 206(d); New York's Equal Pay Law, as amended, N.Y. Lab. L. Art. 6, § 194; and the New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101 *et seq.* and seeks related damages;

WHEREAS, the current Scheduling Order in this case, ECF No. 61, anticipated that expert discovery would be completed by December 18, 2020;

WHEREAS, both Parties have indicated that they will seek to introduce only expert testimony related to economic damages;

WHEREAS, the Parties believe that efficiency will be served by adjourning expert discovery until after any dispositive motions have been fully submitted and an order has been entered by the Court;

IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES that:

1. Neither Plaintiff nor Defendant will seek to introduce expert discovery unrelated to economic damages.

2. Plaintiff and Defendant will seek the Court's approval to defer expert discovery

until after dispositive motions have been fully submitted and a judgment has been entered by the Court.

3. Following the Court's order on dispositive motions, the Parties will cooperate in setting an expert discovery schedule and seeking approval from the Court for that schedule.

4. This stipulation is without prejudice to the rights, claims, arguments and defenses of all parties.

Dated: December 17, 2020

By: _____

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SO ORDERED.

Hon. Gabriel W. Gorenstein
UNITED STATES MAGISTRATE JUDGE